

UNITED STATES DISTRICT COURT FOR THE
FEDERAL DISTRICT OF NEW JERSEY

PATRICIA O'CONNOR and MEGAN
O'CONNOR,

Plaintiffs,

vs.

THE DODGE COMPANY, INC.;
PIERCE COMPANIES; HYDROL
CHEMICAL COMPANY; XYZ CORP.,
INC. (1-100); JOHN DOES (1-
100) and JANE DOES (1-100),

Defendants.

CIVIL ACTION No: 2:16-cv-05177

JOINT MOTION FOR PARTIAL DISMISSAL

1. Plaintiffs, PATRICIA O'CONNOR and MEGAN O'CONNOR, and Defendants, PIERCE CHEMICALS ROYAL BOND COMPANY, now known as Firestone and Barber Investments, Inc. (and referred to in this action and herein as "PIERCE COMPANIES") and HYDROL CHEMICAL COMPANY, (collectively "the Parties"), hereby move for the partial dismissal of this proceeding under Federal Rule of Civil Procedure 41(a)(2).

2. The parties hereto have entered into confidential settlement agreements for the amicable resolution of claims among them in the above-captioned matter, which was initiated by Plaintiffs with the filing of a Complaint pursuant to, *inter alia*, the New Jersey Products Liability Act, N.J.S.A. 2A:58C, *et seq.*

3. In consideration of, and consistent with the terms of the Settlement Agreements, the Parties jointly move the Court to dismiss the lawsuit with prejudice, as to Defendants, PIERCE